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September 18, 1998

HAND DELIVERED



Hon. Joseph G. Scoville
United States District Court
Western District of Michigan
666 Federal Building
Grand Rapids, MI 49503

Re: United States of America v. City of Albion, Michigan v. Cooper Industries, et al., Case No. 1:97-CV-1037 (W.D. Mich.); Sheridan Township Landfill, Calhoun County, Michigan

Dear Judge Scoville:

Enclosed is a proposed discovery Stipulation between Plaintiff United States and Defendant City of Albion regarding certain outstanding Requests for Admissions. Because of the potential that such could be deemed admitted if not timely answered or objected to, we are proposing this Stipulation. We do not, however, intend to in any way interfere with your proposed modification of the Pretrial Scheduling Order as discussed at the end of our September 15 Settlement Conference.

If you have any questions with regard to this Stipulation, or if you would like us to prepare a proposed Order, please let me know.

Very truly yours,

VARNUM, RIDDERING, SCHMIDT & HOWLETT^{LLP}

Charles M. Denton
Charles M. Denton

/ss

Enc.

cc: Clerk of the Court
Counsel of Record
Mr. Kim A. Cox
Mr. Charles A. Robison

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

UNITED STATES OF AMERICA,
Plaintiff,

CIVIL ACTION NO. 1:97-CV-1037

v.

CITY OF ALBION, MICHIGAN,
Defendant/Third-Party
Plaintiff/Counter-Defendant,

Hon. David W. McKeague

v.

**STIPULATION TO EXTEND
REQUESTS FOR ADMISSIONS**

COOPER INDUSTRIES, INC.,
and CORNING INCORPORATED,
Third-Party Defendants/Counter-
Plaintiff/Third-Party Plaintiffs,

v.

DECKER MANUFACTURING CORPORATION,
Third-Party Defendant.

Francis J. Biros
Trial Attorney
Attorney for Plaintiff
Environmental Enforcement Section
Environment and Natural Resources Division
UNITED STATES DEPARTMENT
OF JUSTICE
P.O. Box 7611, Ben Franklin Station
Washington, D.C. 20044-7611
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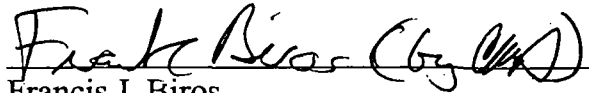
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BULLEN, MOILANEN, KLAASEN & SWAN, P.C.
Attorney for Third-Party Defendant
Decker Manufacturing Corporation
402 S. Brown Street
Jackson, Michigan 49203-1426

NOW COME Plaintiff and Defendant, by and through their respective counsel of record, and hereby stipulate and agree as follows:

The time for Defendant to answer, respond or object to Plaintiff's First Set of Requests for Admissions, dated August 31, 1998, is hereby extended to October 29, 1998.

Dated: September 18, 1998



Francis J. Biros
Environmental Enforcement Section
Environmental and Natural Resources Division
United States Department of Justice
P.O. Box 7611
Ben Franklin Station
Washington, D.C. 20044
phone: 202/616-6552

VARNUM, RIDDERING, SCHMIDT & HOWLETT LLP
Attorneys for Defendant/Third-Party Plaintiff/
Counter-Defendant/Counter-Claimant City of Albion

Dated: September 18, 1998

By: 

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Mark M. Davis (P 43529)

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**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,
Plaintiff,

CIVIL ACTION NO. 1:97-CV-1037

v.

HON. David W. McKeague

CITY OF ALBION, MICHIGAN,

Defendant/Third-Party
Plaintiff/Counter-Defendant

v.

COOPER INDUSTRIES, INC.,
and CORNING INCORPORATED,

PROOF OF SERVICE

Third-Party Defendants/Counter-
Plaintiffs/Third-Party Plaintiffs

v.

DECKER MANUFACTURING CORPORATION

Third-Party Defendant.

STATE OF MICHIGAN)

) ss:

COUNTY OF KENT)

I, Sharon L. Schipper, hereby certify that on the 18th day of September, 1998, I served a copy of the STIPULATION TO EXTEND REQUESTS FOR ADMISSIONS by regular mail, postage prepaid on the following parties-in-interest:

W. Francesca Ferguson
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Kathleen K. Schnieders
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Region V
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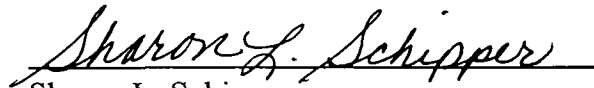
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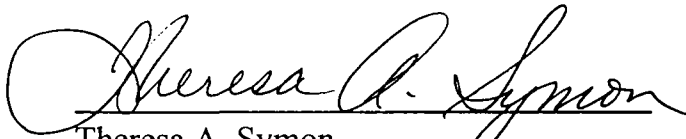
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Jackson, Michigan 49203-1426

Daniel DeWitt
WARNER, NORCROSS & JUDD
900 Old Kent Building
Grand Rapids, Michigan 49503

Dated: September 18, 1998


Sharon L. Schipper

Subscribed and sworn to before
me this 18th day of September, 1998


Theresa A. Symon
Notary Public, Kent County, Michigan
My Commission Expires: 10/3/98